

EXHIBIT B

Plaintiff's May 4, 2017 MPIA Request

Eric Wang
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BY E-MAIL (mpia@rockvillemd.gov)

May 4, 2017

Ms. Louise Atkins
MPIA Coordinator
City Manager's Office
111 Maryland Ave.
Rockville, MD 20850

Re: Maryland Public Information Act Request

Dear Ms. Atkins,

In response to your e-mail dated May 1, 2017, this letter revises and supersedes -- for the time being -- my Maryland Public Information Act request dated April 24, 2017, per your suggestion to narrow the request to limit costs.

REQUESTS FOR DOCUMENTS

Please produce the following:

1. Each document that is, contains, refers to, or describes any goals and/or purposes of the City's installation of automated traffic enforcement systems, including but not limited to the City's revenue goals related to the installation of such systems.
2. Each document that is, contains, refers to, or describes any communications by or amongst any members of the City Council relating to the goals and/or purposes of the City's installation of automated traffic enforcement systems, including but not limited to the City's revenue goals related to the installation of such systems.
3. Each document that is, contains, refers to, or describes the efficacy of the City's automated traffic enforcement systems in achieving those systems' purported goals and/or

purposes, including but not limited to the City's revenue goals related to the installation of such systems.

4. Each document that is, contains, refers to, or describes any communications by or amongst any members of the City Council relating to the efficacy of the City's automated traffic enforcement systems in achieving those systems' purported goals and/or purposes.

5. Each document that is, contains, refers to, or describes the criteria the City uses to determine the locations at which automated traffic enforcement systems are installed.

6. Each document that is, contains, refers to, or describes any communications by or amongst any members of the City Council relating to the criteria the City uses to determine the locations at which automated traffic enforcement systems are installed.

INSTRUCTIONS AND DEFINITIONS

1. The timeframe for these requests covers any documents and communications that may have been created and/or circulated beginning in November 2015 until the present day.

2. For searching electronic documents and communications, the requester suggests the following terms: "speed monitoring system"; "speed camera"; and "red light camera". For Requests No. 1 through 4, to the extent Boolean searches may be used, the requester suggests searches involving ("speed monitoring system" or "speed camera" or "red light camera") and (safety or revenue). For Requests No. 5 and 6, to the extent Boolean searches may be used, the requester suggests searches involving ("speed monitoring system" or "speed camera" or "red light camera") and (siting or location). These suggested search terms are not meant to obviate the production of any other documents that are known to or discoverable by the City that do not contain these terms, but that nonetheless are responsive to the requests above.

3. "Document" or "documents" includes all non-living means of recording information in any media, such as papers, books, digital files, emails, voicemails, instant messaging, faxes, and others. Each non-identical item is a separate document, including those bearing comments, alterations, notes, transmission slips, or other notations.

4. "Communication" means any transmission, conveyance, or exchange of information, whether by written, oral, or other means, such as in person or telephonic conversations, letters, and any form of electronic messaging.

5. "Automated traffic enforcement system" means: (1) any "traffic control signal monitoring system" as described in Md. Transp. Code § 21-202.1 (so-called "red light cameras"); and (2) any "speed monitoring system" as described in *id.* § 21-809 (so-called "speed cameras").

6. "City" means the City of Rockville, Maryland.

7. "City Council" means the council set forth in Rockville City Charter Art. II, § 1, and specifically includes all Councilmembers and the Mayor.

* * *

If all or any part of this request is denied, I request that I be provided with a written statement of the grounds for the denial. If you determine that some portions of the requested records are exempt from disclosure, please provide me with the portions that can be disclosed.

If the records described above are available in an electronic format, I request that the information be provided to me via e-mail if possible at the address below.

Please do not hesitate to contact me if you have any questions about this request. Thank you for your timely attention to this request within the timeframe prescribed in Md. Gen. Prov. Code § 4-203.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Wang", with a long, sweeping horizontal stroke extending to the right.

Eric Wang

llcfrlaw@gmail.com

cc: Debra Yerg Daniel
City Attorney, City of Rockville